VEOLIA
ENVIRONMENTAL SERVICES

TECHNICAL SOLUTIONS
NORTH AMERICA

March 16, 2010
Via FedEx

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
United States Environmental Protection Agency
Region 5
77 W. Jackson Blvd., AE-17J
Chicago, IL 60604

RE: Veolia ES Technical Solutions, L.L.C.
163121AAP
40 CFR Part 63 – Subpart EEE
National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors
Notification of Compliance (NOC) and Comprehensive Performance Test Reports

Compliance Tracker,

Pursuant to the requirements of 40 CFR 63.1200, subpart EEE, Veolia ES Technical Solutions, L.L.C., hereby submits the Notification of Compliance (NOC) and the Performance Test Reports for Incinerators 2, 3 and 4. The NOC documents compliance with the emission standards and continuous monitoring system requirements, and identifying operating parameters defined in 40 CFR 63.1209 and 63.1219. Veolia is now complying with all operating requirements specified in this NOC. The Performance Test Reports detail compliance with these standards.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the

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information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Upon review of this submittal, should the Agency have a need for additional information or questions, please contact Dennis Warchol at (618) 271-2804 or via e-mail at dwarchol@onyxes.com or myself at (618) 271-2804 or via e-mail at dharris@onyxes.com..

Sincerely,
Veolia ES Technical Solutions, L.L.C.

Doug Harris
General Manager

Att.

cc: USEPA File

Notification of Compliance (NOC) Report

Veolia ES Technical Solutions, L.L.C. hereby submits the Notification of Compliance (NOC) Report in compliance with 40 CFR 63.1210(b) and 40 CFR 63.1207(j)

Applicable Rule: 40 CFR Part 63.1200, Subpart EEE — National Emission Standards for Hazardous Air Pollutants for Hazardous Waste Combustors. This NOC is being made in accordance with §63.9(h).

SECTION I
GENERAL INFORMATION

A. If you have been issued a Title V permit, do not complete this form. Submit your NOC in accordance with your Title V permit. [§63.9(h)(3)]

B. If you have not been issued a Title V permit, complete the remaining portions of this section and also complete Sections II-IX. [§63.9(h)(2)(i)]

C. Print or type the following information for each facility for which you are making notification of compliance status:

Operating Permit Number (OPTIONAL)	Facility I.D. Number (OPTIONAL)
V-IL-1716300103-08-01	ILD098642424

Responsible Official's Name/Title
Doug Harris

Street Address
#7 Mobile Ave.

City	State	ZIP Code
Sauget	IL	62201-1069

Facility Name (if different from Responsible Official's Name)
Veolia ES Technical Solutions, L.L.C.

Facility Street Address (If different than Responsible Official's Street Address)

Facility Local Contact Name	Title	Phone (OPTIONAL)
Doug Harris	General Manager	618-271-2804

City	State	ZIP Code
Sauget	IL	62201-1069

D. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Compliance Date (mm/dd/yy)
40 CFR 63.1200	**October 14, 2008**

SECTION II
CERTIFICATION *(Note: you may edit the text in this section as deemed appropriate)*

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge. The above-mentioned facility has complied with the relevant standard or and other applicable requirements referenced in the relevant standard. [§63.9(h)(2)(i)(G)]

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Doug Harris	General Manager	03/16/2010

Signature of Responsible Official

Doug Harris

SECTION III

Describe the methods you used to determine compliance. [§63.9(h)(2)(i)(A)]

RCRA Trial Burn Data from EPA approved testing as required by the RCRA Part B permit and using all approved EPA methods were used to demonstrate compliance with all applicable emission standards defined in 40 CFR 63.1219. In addition, Comprehensive Performance Testing approved by USEPA, Region 5 on August 8, 2008 and conducted in August and September of 2008 and Comprehensive Performance Testing approved by USEPA, Region 5 on November 25, 2009 and conducted in December, 2009. See the attached Operating Parameters Tables and HWC MACT Emission Standards table for Units 2/3 and Unit 4, that define the operating parameters established during testing that ensures compliance with the performance standards.

SECTION IV

Describe the results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted. [§63.9(h)(2)(i)(B)]

See attached test results that were used to develop the limits defined in the Operating Parameter Tables referenced in Section III of this report. These results also include CMS Performance evaluations and monitoring methods.

SECTION V

Describe the methods you will use to determine continuous compliance, including a description of monitoring and reporting requirements and test methods. [§63.9(h)(2)(i)(C)]

Continuous compliance is based on the operating parameter limits established from compliance testing, defined in the attached Operating Parameters Table referenced in Section III of this report. These incinerator operating parameters are monitored continuously to verify compliance by a process monitoring and control system. The details of these systems are defined in detail in Section 2.0, Incinerator Process description referenced in Section VIII of this report and attached.

SECTION VI

Describe the type and quantity of hazardous air pollutants (HAP) emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard. [§63.9(h)(2)(i)(D)]

See attached test results from compliance testing that was conducted to demonstrate compliance with the HAP's and other pollutants defined in Subpart EEE.

SECTION VII

If the relevant standard applies to both major and area sources, present an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification. [§63.9(h)(2)(i)(E)]

This facility is a major source due to its applicability to the NESHAP regulations, specifically Subpart EEE and Subpart DD. Regardless of the facility's emission concentrations, this facility is a major source by definition.

SECTION VIII

Describe the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method). [§63.9(h)(2)(i)(F)]

See attached Section 2.0, Incinerator Process Description from 2009 Performance Test Plans for Incinerators 2, 3 and 4 that describes the air pollution control equipment for each emission point. Also, see attached the compliance testing data defined in Section IV of this report that details the control efficiency for each control device.

SECTION IX

A. Did you submit an application for construction or reconstruction under §63.5(d) that contained preliminary or estimated data? [§63.9(h)(5)]

Yes □. . . No □. . . Not applicable □. (did not submit an application for construction or reconstruction).

B. If you answered yes, provide actual emission data or other corrected information below.

END OF FORM. ***A Responsible Official must sign this form*** **– See Section II.**

HWC MACT Emission Standards

Parameter	Units	Standard (@7% O2)	Method of Compliance
Dioxin/Furan (D/F)	ng/dscm TEQ	0.20 (>400 deg F) 0.40 (≤400 deg F)	Operating Parameter Limits
Mercury (Hg)	ug/dscm	130	Operating Parameter Limits
Semivolatile Metals (SVM) Cadmium, Lead	ug/dscm	230	Operating Parameter Limits
Low Volatile Metals (LVM) Arsenic, Beryllium, Chromium	ug/dscm	92	Operating Parameter Limits
Carbon Monoxide (CO)	ppmv	100	Continuous Emissions Monitor
Hydrogen Chloride/Chlorine (HCl/Cl2)	ppmv	32	Operating Parameter Limits
Particulate	gr/dscf	0.013	Operating Parameter Limits

UNITS 2/3 OPERATING PARAMETER LIMITS [1]

Operating Parameter	Units	Limits	Test Date	Performance Standards
Maximum Total Pumpable Waste (Hourly Rolling Total)	Lb/hr	3107	Jan, 1993	DRE, D/F
Maximum Total Hazardous Waste (Hourly Rolling Total)	Lb/hr	4017	Jan, 1993	DRE, D/F
Maximum Stack Gas Flow Rate (Hourly Rolling Average)	Acfm	15,147	Jan, 1993	DRE, D/F, Part., SVM, LVM
Minimum Primary Combustion Chamber Temperature (Hourly Rolling Average)	Deg F	1686	Dec, 2009	DRE, D/F
Minimum Secondary Combustion Chamber Temperature (Hourly Rolling Average)	Deg F	1877	Dec., 2009	DRE, D/F
Maximum Baghouse Inlet Temperature (Hourly Rolling Average)	Deg F	420	Dec, 2009	D/F, SVM, LVM
Max. Pump. Low Volatile Metals Feedrate (12 Hour Rolling Total)	Lb/hr	46	Sep, 2008	LVM
Max. Total Low Volatile Metals Feedrate (12 Hour Rolling Total)	Lb/hr	47	Sep, 2008	LVM
Maximum Semi Volatile Metals Feedrate (12 Hour Rolling Total)	Lb/hr	63	Sep, 2008	SVM
Maximum Mercury Feedrate (12 Hour Rolling Total)	Lb/hr	0.0019	Aug, 2008	Hg
Maximum Chlorine Feedrate (12 Hour Rolling Total)	Lb/hr	218	Aug, 2008	SVM, LVM HCl/Cl2
Maximum Ash Feedrate (12 Hour Rolling Total)	Lb/hr	617	Dec, 2009	Part.
Minimum Sorbent Feedrate (Hourly Rolling Average)	Lb/lb Cl_2	1.57	Dec, 2009	HCl/Cl2
Minimum Carrier Fluid Flowrate (Hourly Rolling Average)	Gal/lb Cl_2	1.46	Dec, 2009	HCl/Cl2

[1] Operating parameter limits in table reflect more conservative value between Unit 2 and Unit 3 test data.

UNIT 4 OPERATING PARAMETER LIMITS

Operating Parameter	Units	Limits	Test Date	Performance Standards
Maximum Total Pumpable Waste (Hourly Rolling Total)	Lb/hr	PCC - 3291 SCC - 1176	Dec, 2009	DRE, D/F
Maximum Total Hazardous Waste (Hourly Rolling Total)	Lb/hr	PCC – 12,897 SCC - 1176	Dec, 2009	DRE, D/F
Maximum Stack Gas Flow Rate (Hourly Rolling Average)	Acfm	37,432	Dec, 2009	DRE, D/F, Part., SVM, LVM
Minimum Primary Combustion Chamber Temperature (Hourly Rolling Average)	Deg F	1499	Dec, 2009	DRE, D/F
Minimum Secondary Combustion Chamber Temperature (Hourly Rolling Average)	Deg F	1886	Dec, 2009	DRE, D/F
Maximum Baghouse Inlet Temperature (Hourly Rolling Average)	Deg F	400	Dec, 2009	D/F, SVM, LVM
Max. Pump. Low Volatile Metals Feedrate (12 Hour Rolling Total)	Lb/hr	47	Aug., 2008	LVM
Max. Total Low Volatile Metals Feedrate (12 Hour Rolling Total)	Lb/hr	50	Aug., 2008	LVM
Maximum Semi Volatile Metals Feedrate (12 Hour Rolling Total)	Lb/hr	64	Aug., 2008	SVM
Maximum Mercury Feed rate (12 Hour Rolling Total)	Lb/hr	0.026	Aug., 2008	Hg
Maximum Chlorine Feed rate (12 Hour Rolling Total)	Lb/hr	229	Dec, 2009	SVM, LVM, HCl/Cl2
Maximum Ash Feed Rate (12 Hour Rolling Total)	Lb/hr	6444	Dec, 2009	Part.
Carbon Injection Feedrate (Hourly Rolling Average)	Lb/hr	6.2	Dec, 2009	D/F, Hg
Minimum Sorbent Feedrate (Hourly Rolling Average)	Lb/lb Cl_2	2.25	Dec, 2009	HCl/Cl2
Minimum Carrier Fluid Flowrate (Hourly Rolling Average)	Gal/lb Cl_2	3.10	Dec, 2009	HCl/Cl2